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13 Attorneys for Plaintiff Bandag, Incorporated  
 14 (now Bridgestone Bandag, LLC)

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

17 IN RE RUBBER CHEMICALS ANTITRUST )  
 LITIGATION )

MDL Docket No. C 04-1648 MJJ  
 Individual Case No. C 06-5700 MJJ

18 )  
 19 )  
 20 THIS DOCUMENT RELATES TO: )

**STIPULATION TO AMEND CASE  
 MANAGEMENT ORDER PURSUANT  
 TO CIVIL LOCAL RULE 6-2 AND  
~~PROPOSED~~ ORDER**

21 *Bridgestone Americas Holding, Inc., et al.* )  
 22 *v. Chemtura Corporation, et al.* )

23 Pursuant to Civil Local Rule 6-2 of the United States District Court for the Northern  
 24 District of California, Plaintiff and Defendants (collectively, the “Parties”) in *Bridgestone*  
 25 *Americas Holding, Inc., et al. v. Chemtura Corporation, et al.*, Individual Case No. C 06-5700  
 26 MJJ (the “Action”), by and through their respective counsel, submit this Stipulation and  
 27 [Proposed] Order;

28 ///

WHEREAS, Plaintiff's action, *Bridgestone Americas Holding, Inc., et al. v. Chemtura Corporation, et al.*, was transferred from the Middle District of Tennessee pursuant to 28 U.S.C. § 1407(c), and docketed with this Court on September 19, 2006;

WHEREAS, a Case Management Order was entered on October 16, 2007;

WHEREAS, to facilitate on-going discovery, the parties have agreed to an extension of time in the amount of thirty (30) calendar days for all pretrial deadlines except the pretrial conference date and the trial date, and if such an extension causes the date to fall on a weekend, the deadline date shall be set for the Monday following the weekend date;

NOW THEREFORE IT IS HEREBY STIPULATED AND AGREED BETWEEN THE PARTIES, BY AND THROUGH THEIR COUNSEL OF RECORD THAT:

The case management schedule shall be revised as follows:

Item	Original Deadline (For All Parties)	Proposed New Deadline (For All Parties)
Discovery Begins (between Individual Defendants and Bandag only)	July 15, 2007 (between individual defendants and Bandag only)	July 15, 2007 (between individual defendants and Bandag only)
Initial Disclosures (between Individual Defendants and Bandag only)	September 12, 2007 (between individual defendants and Bandag only)	September 12, 2007 (between individual defendants and Bandag only)
Plaintiff's Expert Reports & Back-Up	December 10, 2007	January 9, 2008
Defendants' Expert Reports & Back-Up	January 7, 2008	February 6, 2008
Plaintiff's Rebuttal Reports & Back-Up	February 4, 2008	March 5, 2008
Deposition of Plaintiff's Experts	Completed by February 19, 2008	Completed by March 20, 2008
Deposition of Defendants' Experts	Completed by March 4, 2008	Completed by April 3, 2008
Discovery Cut-Off	April 10, 2008	Completed by May 12, 2008
Dispositive Motions	April 30, 2008	May 30, 2008
Oppositions to Dispositive Motions	May 29, 2008	June 30, 2008
Replies in support of Dispositive Motions	June 19, 2008	July 21, 2008
Hearing on Dispositive Motions	July 9, 2008 at 2:30 PM	August 12, 2008

Item	Original Deadline (For All Parties)	Proposed New Deadline (For All Parties)
Remand Date	July/August 2008	August/September 2008
Pretrial Conference	September 16, 2008 at 3:30 PM	September 16, 2008 at 3:30 PM
Trial Date <sup>1</sup>	October 6, 2008 at 8:30 AM	October 6, 2008 at 8:30 AM

**IT IS SO STIPULATED.**

Respectively submitted,

Dated: November 21, 2007

**CROWELL & MORING LLP**

/s/ Daniel A. Sasse

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 Daniel A. Sasse  
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DC4602017 (Cam No. 101692.005)

[SIGNATURES CONTINUED ON FOLLOWING PAGE]

<sup>1</sup> Pursuant to 28 U.S.C. § 1407(a), Defendant Chemtura Corporation submits that the trial date must be set by the transferor court, the Middle District of Tennessee, after remand from this Court at the close of pretrial proceedings. See *Lexecon Inc. v. Milberg Weiss Bershad Hynes & Lerach*, 523 U.S. 26 (1998).

1                                    ADDITIONAL SIGNATURE PAGE TO STIPULATION TO AMEND  
2                                    CASE MANAGEMENT ORDER

3       Dated: November 20, 2007

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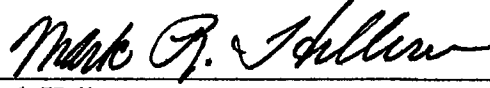
24                                    Attorneys for Defendants Chemtura Corporation  
25                                    (formerly known as Crompton Corporation) and  
26                                    Uniroyal Chemical Company, Inc.  
27                                    (now merged into Chemtura Corporation)

28                                    [SIGNATURES CONTINUED ON FOLLOWING PAGE]

1 ADDITIONAL SIGNATURE PAGE TO STIPULATION TO AMEND  
2 CASE MANAGEMENT ORDER

3 Dated: November 20, 2007

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11 Attorney for Defendant James J. Conway

12 Dated: November \_\_, 2007

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20 Dated: November \_\_, 2007

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27 Attorneys for Defendant Joseph B. Eisenberg

28 [SIGNATURES CONTINUED ON FOLLOWING PAGE]

1                                    **ADDITIONAL SIGNATURE PAGE TO STIPULATION TO AMEND**  
2                                    **CASE MANANGEMENT ORDER**

3        Dated: November 20, 2007

**PILLSBURY WINTHROP SHAW PITTMAN LLP**

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12       Dated: November 20, 2007

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21       Dated: November 20, 2007

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29                                    [SIGNATURES CONTINUED ON FOLLOWING PAGE]

1 ADDITIONAL SIGNATURE PAGE TO STIPULATION TO AMEND  
2 CASE MANAGEMENT ORDER

3 Dated: November 20, 2007

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12 Dated: November 20, 2007

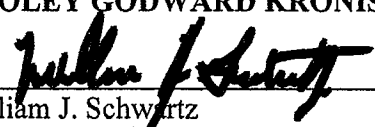
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20 Dated: November 20, 2007

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[SIGNATURES CONTINUED ON FOLLOWING PAGE]

1                                    ADDITIONAL SIGNATURE PAGE TO STIPULATION TO AMEND  
2                                    CASE MANAGEMENT ORDER

3       Dated: November 20, 2007

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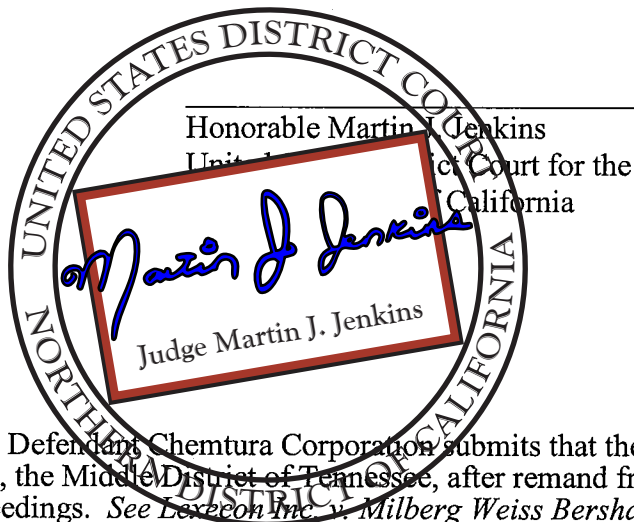
**PROPOSED AMENDED CASE MANAGEMENT ORDER**

The Court has considered the Stipulation to Amend the Case Management Order submitted by the Parties, and hereby orders that the following amended case management schedule shall govern the proceedings in *Bridgestone Americas Holding, Inc., et al. v. Chemtura Corporation, et al.*, Individual Case No. C 06-5700 MJJ:

Item	Deadlines/Dates
Discovery Begins (between Individual Defendants and Bandag only)	July 15, 2007 (between individual defendants and Bandag only)
Initial Disclosures (between Individual Defendants and Bandag only)	September 12, 2007 (between individual defendants and Bandag only)
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Remand Date	August/September 2008
Pretrial Conference	September 16, 2008 at 3:30 PM
Trial Date <sup>1</sup>	October 6, 2008 at 8:30 AM

**IT IS SO ORDERED.**

Dated: 11/28/07



<sup>1</sup> Pursuant to 28 U.S.C. § 1407(a), Defendant Chemtura Corporation submits that the trial date must be set by the transferor court, the Middle District of Tennessee, after remand from this Court at the close of pretrial proceedings. See *Lexecon Inc. v. Milberg Weiss Bershad Hynes & Lerach*, 523 U.S. 26 (1998).